

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

JOHN H. MURPHY,)	CIVIL ACTION NO.
)	3:15-CV-92-TCB
Plaintiff,)	
)	
v.)	
)	
MILLARD C. FARMER, JR., et al.,)	
)	
Defendants.)	

**ANSWER OF ALFRED L. KING, JR.
AND LARRY KING, P.C. TO PLAINTIFF'S AMENDED COMPLAINT**

Defendants Alfred L. King, Jr. and Larry King, P.C. (the “King Defendants”) answer Plaintiff’s Complaint as follows:

FIRST DEFENSE

Plaintiff’s Amended Complaint fails to state a claim upon which relief can be granted and should be dismissed.

SECOND DEFENSE

Plaintiff’s Amended Complaint is not a “short and plain statement of the claim” as required by Federal Rule of Civil Procedure 8(a)(2).

THIRD DEFENSE

Plaintiff's Amended Complaint fails to plead fraud with particularity as required by Federal Rule of Civil Procedure Procedure 9(b).

FOURTH DEFENSE

Plaintiff's claims are barred at least in part by res judicata.

FIFTH DEFENSE

Plaintiff has failed to mitigate his damages.

SIXTH DEFENSE

Plaintiff's state law racketeering claims are barred at least in part by O.C.G.A. § 51-7-85.

SEVENTH DEFENSE

Plaintiff lacks standing to prosecute some of the claims in the Amended Complaint.

EIGHTH DEFENSE

Plaintiff cannot recover prejudgment interest because Plaintiff failed to satisfy applicable procedural requirements necessary to perfect a claim for prejudgment interest.

RESPONSES TO SPECIFIC ALLEGATIONS

Subject to and without waiving the foregoing affirmative defenses, the King Defendants answer the numbered allegations of Plaintiff's Amended Complaint as follows:

1.

The King Defendants deny the allegations contained in the first sentence of paragraph 1 of Plaintiff's Amended Complaint. The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1 of Plaintiff's Amended Complaint.

2.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of Plaintiff's Amended Complaint.

3.

In response to the allegations contained in paragraph 3 of Plaintiff's Amended Complaint, the King Defendants acknowledge that Plaintiff has accurately quoted excerpts from the referenced appellate opinions and simply state that the appellate opinions speak for themselves.

4.

The King Defendants deny the allegations contained in paragraph 4 of Plaintiff's Amended Complaint.

5.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of Plaintiff's Amended Complaint.

6.

The King Defendants deny the allegations contained in paragraph 6 of Plaintiff's Amended Complaint.

7.

The King Defendants deny the allegations contained in paragraph 7 of Plaintiff's Amended Complaint.

8.

The King Defendants deny the allegations contained in paragraph 8 of Plaintiff's Amended Complaint.

9.

The King Defendants deny the allegations contained in paragraph 9 of Plaintiff's Amended Complaint.

10.

The King Defendants deny the allegations contained in paragraph 10 of Plaintiff's Amended Complaint.

11.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of Plaintiff's Amended Complaint.

12.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the last sentence contained in paragraph 12 of Plaintiff's Amended Complaint. The King Defendants deny the remaining allegations contained in paragraph 12 of Plaintiff's Amended Complaint.

13.

The King Defendants deny the allegations contained in paragraph 13 of Plaintiff's Amended Complaint.

14.

The King Defendants deny the allegations contained in the first sentence of paragraph 14 of Plaintiff's Amended Complaint. The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 14 of Plaintiff's Amended Complaint.

15.

The King Defendants deny the allegations contained in paragraph 15 of Plaintiff's Amended Complaint.

16.

The King Defendants deny the allegations contained in paragraph 16 of Plaintiff's Amended Complaint.

17.

The King Defendants deny that they engaged in any of the wrongdoing alleged in paragraph 17 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of Plaintiff's Amended Complaint.

18.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of Plaintiff's Amended Complaint.

19.

The King Defendants deny the allegations contained in paragraph 19 of Plaintiff's Amended Complaint.

20.

The King Defendants deny that they are part of any racketeering enterprise but otherwise admit the allegations contained in paragraph 20 of Plaintiff's Amended Complaint.

21.

The King Defendants deny the allegations contained in the fourth sentence of paragraph 21 of Plaintiff's Amended Complaint. The King Defendants admit the remaining allegations contained in paragraph 21 of Plaintiff's Amended Complaint.

22.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of Plaintiff's Amended Complaint.

23.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of Plaintiff's Amended Complaint.

24.

The King Defendants deny that they conspired with any of the people listed in paragraph 24 of Plaintiff's Amended Complaint. The King Defendants otherwise lack information or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of Plaintiff's Amended Complaint.

25.

The King Defendants deny that they conspired with any of the people listed in paragraph 25 of Plaintiff's Amended Complaint. The King Defendants otherwise lack information or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of Plaintiff's Amended Complaint.

26.

The King Defendants deny the allegations contained in paragraph 26 of Plaintiff's Amended Complaint.

27.

The King Defendants deny the allegations contained in paragraph 27 of Plaintiff's Amended Complaint.

28.

The King Defendants deny the allegations contained in paragraph 28 of Plaintiff's Amended Complaint.

29.

The King Defendants admit that the Court has personal jurisdiction, although the King Defendants note that the Court cannot have jurisdiction over any person if the Court lacks jurisdiction over the subject matter.

30.

The King Defendants admit the allegations contained in paragraph 30 of Plaintiff's Amended Complaint.

31.

The King Defendants admit the allegations contained in paragraph 31 of Plaintiff's Amended Complaint.

32.

The King Defendants admit the allegations contained in paragraph 32 of Plaintiff's Amended Complaint.

33.

The King Defendants admit the allegations contained in paragraph 33 of Plaintiff's Amended Complaint.

34.

The King Defendants admit the allegations contained in paragraph 34 of Plaintiff's Amended Complaint.

35.

The King Defendants admit the allegations contained in paragraph 35 of Plaintiff's Amended Complaint.

36.

The King Defendants admit the allegations contained in paragraph 36 of Plaintiff's Amended Complaint.

37.

The King Defendants admit the allegations contained in paragraph 37 of Plaintiff's Amended Complaint.

38.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of Plaintiff's Amended Complaint.

39.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of Plaintiff's Amended Complaint.

40.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of Plaintiff's Amended Complaint.

41.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of Plaintiff's Amended Complaint.

42.

The King Defendants deny the allegations contained in paragraph 42 of Plaintiff's Amended Complaint.

43.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of Plaintiff's Amended Complaint.

44.

The King Defendants admit that Plaintiff filed the state court child custody case on April 11, 2012 but lack knowledge or information about his reasons for filing it.

45.

The King Defendants admit the allegations contained in the first three sentences of paragraph 45 of Plaintiff's Amended Complaint. The King

Defendants deny the remaining allegations contained in paragraph 45 of Plaintiff's Amended Complaint.

46.

The King Defendants deny the allegations contained in paragraph 46 of Plaintiff's Amended Complaint.

47.

The King Defendants admit that Michelle Murphy filed an answer on May 11, 2012 and also admit the filing of a third-party complaint but deny Plaintiff's characterization of it.

48.

The King Defendants deny the allegations contained in paragraph 48 of Plaintiff's Amended Complaint.

49.

The King Defendants admit the allegations contained in paragraph 49 of Plaintiff's Amended Complaint.

50.

The King Defendants deny the allegations contained in paragraph 50 of Plaintiff's Amended Complaint.

51.

The King Defendants deny the allegations contained in paragraph 51 of Plaintiff's Amended Complaint.

52.

The King Defendants deny as stated the allegations contained in paragraph 52 of Plaintiff's Amended Complaint but acknowledge that no private meeting ever took place.

53.

The King Defendants deny that the referenced third party complaint was frivolous but otherwise admit the allegations contained in paragraph 53 of Plaintiff's Amended Complaint.

54.

The King Defendants deny the allegations contained in the first and last sentences of paragraph 54 of Plaintiff's Amended Complaint. Other than responding that the referenced pleading speaks for itself, the King Defendants lack knowledge or information sufficient to respond to the remaining allegations contained in paragraph 54 of Plaintiff's Amended Complaint.

55.

The King Defendants deny the allegations contained in Paragraph 55 of Plaintiff's Amended Complaint.

56.

The King Defendants admit that the referenced second amended third party complaint was filed on September 20, 2012 and also acknowledge that Plaintiff has accurately quoted excerpts from it. The King Defendants otherwise deny the allegations contained in paragraph 56 of Plaintiff's Amended Complaint.

57.

The King Defendants deny the allegations contained in Paragraph 57 of Plaintiff's Amended Complaint.

58.

The King Defendants deny the allegations contained in Paragraph 58 of Plaintiff's Amended Complaint.

59.

The King Defendants admit the allegations contained in paragraph 59 of Plaintiff's Amended Complaint.

60.

The King Defendants deny the allegations contained in paragraph 60 of Plaintiff's Amended Complaint.

61.

The King Defendants deny the allegations contained in paragraph 61 of Plaintiff's Amended Complaint.

62.

The King Defendants deny the allegations contained in paragraph 62 of Plaintiff's Amended Complaint.

63.

The King Defendants admit generally that the purpose of a guardian ad litem is to represent the best interests of the children. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of Plaintiff's Amended Complaint.

64.

The King Defendants admit that they objected to a guardian ad litem—but not because they objected to advancing the best interests of the children. The King

Defendants admit the remaining allegations contained in paragraph 64 of Plaintiff's Amended Complaint.

65.

The King Defendants deny the allegations contained in paragraph 65 of Plaintiff's Amended Complaint.

66.

The King Defendants admit the allegations contained in the first sentence of paragraph 66 of Plaintiff's Amended Complaint. The King Defendants also admit filing the motion to disqualify but deny Plaintiff's characterizations.

67.

The King Defendants disagree with the ruling of the Georgia Court of Appeals but otherwise admit the allegations contained in paragraph 67 of Plaintiff's Amended Complaint.

68.

The King Defendants admit the allegations contained in the first sentence of paragraph 68 of Plaintiff's Amended Complaint. The King Defendants deny the remaining allegations contained in paragraph 68 of Plaintiff's Amended Complaint.

69.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of Plaintiff's Amended Complaint.

70.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of Plaintiff's Amended Complaint.

71.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of Plaintiff's Amended Complaint.

72.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of Plaintiff's Amended Complaint.

73.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of Plaintiff's Amended Complaint.

74.

The King Defendants admit the allegations contained in the first sentence of paragraph 74 of Plaintiff's Amended Complaint. The King Defendants deny the remaining allegations contained in paragraph 74 of Plaintiff's Amended Complaint.

75.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of Plaintiff's Amended Complaint.

76.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of Plaintiff's Amended Complaint.

77.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of Plaintiff's Amended Complaint.

78.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of Plaintiff's Amended Complaint.

79.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of Plaintiff's Amended Complaint.

80.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of Plaintiff's Amended Complaint.

81.

The King Defendants admit the allegations contained in the last sentence of paragraph 81 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 81 of Plaintiff's Amended Complaint.

82.

The King Defendants admit the allegations contained in paragraph 82 of Plaintiff's Amended Complaint.

83.

The King Defendants admit the allegations contained in paragraph 83 of Plaintiff's Amended Complaint.

84.

The King Defendants deny the allegations contained in paragraph 84 of Plaintiff's Amended Complaint.

85.

The King Defendants deny the allegations contained in paragraph 85 of Plaintiff's Amended Complaint.

86.

The King Defendants admit the allegations contained in paragraph 86 of Plaintiff's Amended Complaint.

87.

The King Defendants admit the allegations contained in paragraph 87 of Plaintiff's Amended Complaint.

88.

The King Defendants admit the allegations contained in the first sentence of paragraph 88 of Plaintiff's Amended Complaint. In response to the remaining allegations contained in paragraph 88 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced affidavit speaks for itself.

89.

In response to the allegations contained in paragraph 89 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced affidavit speaks for itself.

90.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of Plaintiff's Amended Complaint.

91.

The King Defendants admit the allegations contained in paragraph 91 of Plaintiff's Amended Complaint.

92.

The King Defendants admit the allegations contained in paragraph 92 of Plaintiff's Amended Complaint.

93.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 93 of Plaintiff's Amended Complaint.

94.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 94 of Plaintiff's Amended Complaint.

95.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 95 of Plaintiff's Amended Complaint.

96.

The King Defendants deny that they threatened Dr. Johnson. The King Defendants also deny knowledge that anyone else threatened Dr. Johnson. The King Defendants lack knowledge or information sufficient to form a belief as to whether anyone threatened Dr. Johnson as Plaintiff alleges in paragraph 96 of the Amended Complaint.

97.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 97 of Plaintiff's Amended Complaint.

98.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 98 of Plaintiff's Amended Complaint.

99.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 99 of Plaintiff's Amended Complaint.

100.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 100 of Plaintiff's Amended Complaint.

101.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 101 of Plaintiff's Amended Complaint.

102.

The King Defendants deny as stated the allegations contained in paragraph 102 of Plaintiff's Amended Complaint.

103.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 103 of Plaintiff's Amended Complaint.

104.

The King Defendants admit that the court called counsel into chambers but otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 104 of Plaintiff's Amended Complaint.

105.

The King Defendants admit the allegations contained in paragraph 105 of Plaintiff's Amended Complaint.

106.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 106 of Plaintiff's Amended Complaint.

107.

The King Defendants admit the allegations contained in paragraph 107 of Plaintiff's Amended Complaint.

108.

The King Defendants admit the allegations contained in paragraph 108 of Plaintiff's Amended Complaint.

109.

The King Defendants admit the allegations contained in paragraph 109 of Plaintiff's Amended Complaint.

110.

The King Defendants admit that Plaintiff has accurately quoted from the referenced motion but otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 110 of Plaintiff's Amended Complaint.

111.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of Plaintiff's Amended Complaint.

112.

The King Defendants admit that Defendant Farmer filed the referenced briefs but lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations in the first sentence of paragraph 112 of Plaintiff's Amended Complaint. The King Defendants admit the remaining allegations contained in the second sentence of paragraph 112 of Plaintiff's Amended Complaint.

113.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of Plaintiff's Amended Complaint.

114.

The King Defendants admit the allegations contained in the first sentence of paragraph 114 of Plaintiff's Amended Complaint. The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 114 of Plaintiff's Amended Complaint.

115.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of Plaintiff's Amended Complaint.

116.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of Plaintiff's Amended Complaint.

117.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of Plaintiff's Amended Complaint.

118.

The referenced filing of September 27, 2013 speaks for itself. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 118 of Plaintiff's Amended Complaint.

119.

The King Defendants admit the allegations contained in paragraph 119 of Plaintiff's Amended Complaint.

120.

The King Defendants admit the allegations contained in paragraph 120 of Plaintiff's Amended Complaint (although the King Defendants note that the contempt citation against King was reversed on appeal).

121.

The King Defendants admit the allegations contained in paragraph 121 of Plaintiff's Amended Complaint (although the King Defendants note that the contempt citation against King was reversed on appeal).

122.

The King Defendants admit the allegations contained in paragraph 122 of Plaintiff's Amended Complaint.

123.

The King Defendants admit the allegations contained in paragraph 123 of Plaintiff's Amended Complaint (although the King Defendants note that the contempt citation against King was reversed on appeal).

124.

The King Defendants admit the allegations contained in the first sentence of paragraph 124 of Plaintiff's Amended Complaint and also admit that the Georgia Court of Appeals excused Michelle Murphy's failure to appear at the hearing. The King Defendants deny the remaining allegations contained in paragraph 124 of Plaintiff's Amended Complaint—Plaintiff conveniently neglects to mention that the Georgia Court of Appeals reversed the contempt citation against King.

125.

The King Defendants admit that motions were filed, but the King Defendants deny Plaintiff's characterizations of those motions and otherwise deny the allegations contained in paragraph 125 of Plaintiff's Amended Complaint.

126.

The King Defendants admit the allegations contained in paragraph 126 of Plaintiff's Amended Complaint.

127.

The King Defendants admit the allegations contained in paragraph 127 of Plaintiff's Amended Complaint.

128.

The King Defendants admit the allegations contained in paragraph 128 of Plaintiff's Amended Complaint.

129.

The King Defendants admit the allegations contained in paragraph 129 of Plaintiff's Amended Complaint.

130.

The King Defendants admit that Plaintiff has accurately quoted a portion of the referenced court order but otherwise deny the allegations contained in paragraph 130 of Plaintiff's Amended Complaint.

131.

The King Defendants admit the filing of the referenced motion but deny Plaintiff's characterization of it.

132.

The King Defendants admit the allegations contained in paragraph 132 of Plaintiff's Amended Complaint.

133.

The King Defendants admit the allegations contained in paragraph 133 of Plaintiff's Amended Complaint.

134.

The King Defendants deny Plaintiff's characterizations of the motion filings but otherwise admit the allegations contained in paragraph 134 of Plaintiff's Amended Complaint.

135.

The King Defendants admit the allegations contained in paragraph 135 of Plaintiff's Amended Complaint.

136.

The King Defendants admit the allegations contained in paragraph 136 of Plaintiff's Amended Complaint.

137.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of Plaintiff's Amended Complaint.

138.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of Plaintiff's Amended Complaint.

139.

The King Defendants admit the allegations contained in paragraph 139 of Plaintiff's Amended Complaint.

140.

The King Defendants admit the allegations contained in paragraph 140 of Plaintiff's Amended Complaint.

141.

The King Defendants admit the allegations contained in paragraph 141 of Plaintiff's Amended Complaint.

142.

The King Defendants admit the allegations contained in paragraph 142 of Plaintiff's Amended Complaint.

143.

The King Defendants admit the allegations contained in paragraph 143 of Plaintiff's Amended Complaint.

144.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144 of Plaintiff's Amended Complaint.

145.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145 of Plaintiff's Amended Complaint.

146.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146 of Plaintiff's Amended Complaint.

147.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in the first sentence of paragraph

147 of Plaintiff's Amended Complaint. The King Defendants deny that they gave any instructions to the minor. The King Defendants admit that the minor was injured but lack knowledge or information sufficient to form a belief as to the truth of the allegation that he "physically resisted."

148.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of Plaintiff's Amended Complaint.

149.

The King Defendants admit filing the referenced motion but deny the allegation in paragraph 149 of Plaintiff's Amended Complaint that they made false representations.

150.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 150 of Plaintiff's Amended Complaint.

151.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 151 of Plaintiff's Amended Complaint.

152.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of Plaintiff's Amended Complaint.

153.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of Plaintiff's Amended Complaint.

154.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154 of Plaintiff's Amended Complaint.

155.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155 of Plaintiff's Amended Complaint.

156.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156 of Plaintiff's Amended Complaint.

157.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157 of Plaintiff's Amended Complaint.

158.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158 of Plaintiff's Amended Complaint.

159.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159 of Plaintiff's Amended Complaint.

160.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of Plaintiff's Amended Complaint.

161.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of Plaintiff's Amended Complaint.

162.

The King Defendants deny the allegations contained in paragraph 162 of Plaintiff's Amended Complaint.

163.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of Plaintiff's Amended Complaint.

164.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of Plaintiff's Amended Complaint.

165.

The King Defendants admit the allegations contained in paragraph 165 of Plaintiff's Amended Complaint.

166.

The King Defendants admit the allegations contained in paragraph 166 of Plaintiff's Amended Complaint but deny that the lawsuit was filed "[d]espite the June 26 Order."

167.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of Plaintiff's Amended Complaint.

168.

The King Defendants deny that Defendant Farmer acted on their behalf and deny that they had anything to do with the alleged bribery. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 168 of Plaintiff's Amended Complaint.

169.

The King Defendants deny Plaintiff's characterization of the court filings but otherwise admit the allegations contained in paragraph 169 of Plaintiff's Amended Complaint.

170.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 170 of Plaintiff's Amended Complaint.

171.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of Plaintiff's Amended Complaint.

172.

The King Defendants deny that they attempted to bribe Judge Baldwin. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of Plaintiff's Amended Complaint.

173.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of Plaintiff's Amended Complaint.

174.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 174 of Plaintiff's Amended Complaint.

175.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of Plaintiff's Amended Complaint.

176.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 176 of Plaintiff's Amended Complaint.

177.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of Plaintiff's Amended Complaint.

178.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 178 of Plaintiff's Amended Complaint.

179.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 179 of Plaintiff's Amended Complaint.

180.

The King Defendants admit the filing of the referenced emergency motion but deny knowledge of any wrongdoing by T.B.

181.

The King Defendants deny that they participated in any of the conduct alleged in paragraph 181 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of Plaintiff's Amended Complaint.

182.

The King Defendants admit the filing of the referenced amendment but deny knowledge that the claims against Plaintiff were false.

183.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in the last two sentences of

paragraph 183 of Plaintiff's Amended Complaint. In response to the remaining allegations contained in paragraph 183 of Plaintiff's Amended Complaint, the King Defendants simply state that the August 8, 2014 filing speaks for itself.

184.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of Plaintiff's Amended Complaint.

185.

The King Defendants admit the allegations contained in paragraph 185 of Plaintiff's Amended Complaint.

186.

The King Defendants admit there was an August 11, 2014 filing on behalf of Michelle Murphy but otherwise deny the allegations contained in paragraph 186 of Plaintiff's Amended Complaint.

187.

The King Defendants admit that the Court entered the referenced order and admit that Exhibit 15 is a copy of that order. The King Defendants deny the allegations about their intent.

188.

The King Defendants admit the allegations contained in the first two sentences of paragraph 188 of Plaintiff's Amended Complaint and also admit the allegations contained in the last sentence. The King Defendants deny the remaining allegations contained in paragraph 188 of Plaintiff's Amended Complaint.

189.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 189 of Plaintiff's Amended Complaint.

190.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of Plaintiff's Amended Complaint.

191.

The King Defendants deny that they participated in any of the wrongdoing alleged in paragraph 191 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of Plaintiff's Amended Complaint.

192.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of Plaintiff's Amended Complaint.

193.

The King Defendants deny that they participated in any of the wrongdoing alleged in paragraph 193 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of Plaintiff's Amended Complaint.

194.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of Plaintiff's Amended Complaint.

195.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 195 of Plaintiff's Amended Complaint.

196.

The King Defendants deny that they participated in any of the wrongdoing alleged in paragraph 196 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of Plaintiff's Amended Complaint.

197.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of Plaintiff's Amended Complaint.

198.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of Plaintiff's Amended Complaint.

199.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 199 of Plaintiff's Amended Complaint.

200.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 200 of Plaintiff's Amended Complaint.

201.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 201 of Plaintiff's Amended Complaint.

202.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 202 of Plaintiff's Amended Complaint.

203.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of Plaintiff's Amended Complaint.

204.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of Plaintiff's Amended Complaint.

205.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 205 of Plaintiff's Amended Complaint.

206.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 206 of Plaintiff's Amended Complaint.

207.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of Plaintiff's Amended Complaint.

208.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of Plaintiff's Amended Complaint.

209.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of Plaintiff's Amended Complaint.

210.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of Plaintiff's Amended Complaint.

211.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of Plaintiff's Amended Complaint.

212.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of Plaintiff's Amended Complaint.

213.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of Plaintiff's Amended Complaint.

214.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 214 of Plaintiff's Amended Complaint.

215.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of Plaintiff's Amended Complaint.

216.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of Plaintiff's Amended Complaint.

217.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of Plaintiff's Amended Complaint.

218.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 218 of Plaintiff's Amended Complaint.

219.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 219 of Plaintiff's Amended Complaint.

220.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 220 of Plaintiff's Amended Complaint.

221.

The King Defendants deny that they participated in any of the conduct alleged in paragraph 221 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of Plaintiff's Amended Complaint.

222.

The King Defendants deny that they participated in any of the conduct alleged in paragraph 222 of Plaintiff's Amended Complaint and deny that that alleged conduct advanced any goal of theirs. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of Plaintiff's Amended Complaint.

223.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of Plaintiff's Amended Complaint.

224.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 224 of Plaintiff's Amended Complaint.

225.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of Plaintiff's Amended Complaint.

226.

The King Defendants deny that they participated in any of the wrongdoing alleged in paragraph 226 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of Plaintiff's Amended Complaint.

227.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of Plaintiff's Amended Complaint.

228.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of Plaintiff's Amended Complaint.

229.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of Plaintiff's Amended Complaint.

230.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of Plaintiff's Amended Complaint.

231.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 231 of Plaintiff's Amended Complaint.

232.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of Plaintiff's Amended Complaint.

233.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of Plaintiff's Amended Complaint.

234.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of Plaintiff's Amended Complaint.

235.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of Plaintiff's Amended Complaint.

236.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 236 of Plaintiff's Amended Complaint.

237.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of Plaintiff's Amended Complaint.

238.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 238 of Plaintiff's Amended Complaint.

239.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 239 of Plaintiff's Amended Complaint.

240.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 240 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 240 of Plaintiff's Amended Complaint.

241.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 241 of Plaintiff's Amended Complaint.

242.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 242 of Plaintiff's Amended Complaint.

243.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 243 of Plaintiff's Amended Complaint.

244.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of Plaintiff's Amended Complaint.

245.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 245 of Plaintiff's Amended Complaint.

246.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 246 of Plaintiff's Amended Complaint.

247.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 247 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 247 of Plaintiff's Amended Complaint.

248.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 248 of Plaintiff's Amended Complaint.

249.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 249 of Plaintiff's Amended Complaint.

250.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 250 of Plaintiff's Amended Complaint.

251.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 251 of Plaintiff's Amended Complaint.

252.

The King Defendants deny that the alleged colloquy recounted in paragraph 252 of Plaintiff's Amended Complaint reflects their intentions or participation. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 252 of Plaintiff's Amended Complaint.

253.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 253 of Plaintiff's Amended Complaint.

254.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 254 of Plaintiff's Amended Complaint.

255.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 255 of Plaintiff's Amended Complaint.

256.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 256 of Plaintiff's Amended Complaint.

257.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 257 of Plaintiff's Amended Complaint.

258.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 258 of Plaintiff's Amended Complaint.

259.

The King Defendants deny that they had anything to do with the conduct alleged in paragraph 259 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 259 of Plaintiff's Amended Complaint.

260.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of Plaintiff's Amended Complaint.

261.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of Plaintiff's Amended Complaint.

262.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of Plaintiff's Amended Complaint.

263.

The King Defendants deny that they learned anything about the children as alleged in paragraph 263 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of Plaintiff's Amended Complaint.

264.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of Plaintiff's Amended Complaint.

265.

Except to say that the Court's order speaks for itself, the King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of Plaintiff's Amended Complaint.

266.

Except to say that the Court's order speaks for itself, the King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 266 of Plaintiff's Amended Complaint.

267.

The King Defendants deny that they engaged in the alleged social media campaign referenced in paragraph 267 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of Plaintiff's Amended Complaint.

268.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of Plaintiff's Amended Complaint.

269.

The King Defendants deny that they engaged in any defamation. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of Plaintiff's Amended Complaint.

270.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 270 of Plaintiff's Amended Complaint.

271.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 271 of Plaintiff's Amended Complaint.

272.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of Plaintiff's Amended Complaint.

273.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of Plaintiff's Amended Complaint.

274.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of Plaintiff's Amended Complaint.

275.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of Plaintiff's Amended Complaint.

276.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of Plaintiff's Amended Complaint.

277.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of Plaintiff's Amended Complaint.

278.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of Plaintiff's Amended Complaint.

279.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 279 of Plaintiff's Amended Complaint.

280.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 280 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of Plaintiff's Amended Complaint.

281.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 281 of Plaintiff's Amended Complaint.

282.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 282 of Plaintiff's Amended Complaint.

283.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 283 of Plaintiff's Amended Complaint.

284.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of Plaintiff's Amended Complaint.

285.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 285 of Plaintiff's Amended Complaint.

286.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 286 of Plaintiff's Amended Complaint.

287.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 287 of Plaintiff's Amended Complaint.

288.

The King Defendants admit the allegations contained in the first sentence of paragraph 288 of Plaintiff's Amended Complaint. The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 288 of Plaintiff's Amended Complaint.

289.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of Plaintiff's Amended Complaint.

290.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 290 of Plaintiff's Amended Complaint.

291.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of Plaintiff's Amended Complaint.

292.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 292 of Plaintiff's Amended Complaint.

293.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 293 of Plaintiff's Amended Complaint.

294.

The King Defendants deny that their goal was to elicit any “large payoff.” The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 294 of Plaintiff’s Amended Complaint.

295.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 295 of Plaintiff’s Amended Complaint.

296.

The King Defendants deny that their goal was to elicit any large payment of attorney’s fees. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 296 of Plaintiff’s Amended Complaint.

297.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 297 of Plaintiff’s Amended Complaint.

298.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of Plaintiff's Amended Complaint.

299.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 299 of Plaintiff's Amended Complaint.

300.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 300 of Plaintiff's Amended Complaint.

301.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 301 of Plaintiff's Amended Complaint.

302.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of Plaintiff's Amended Complaint.

303.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 303 of Plaintiff's Amended Complaint.

304.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 304 of Plaintiff's Amended Complaint.

305.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 305 of Plaintiff's Amended Complaint.

306.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 306 of Plaintiff's Amended Complaint.

307.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 307 of Plaintiff's Amended Complaint.

308.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 308 of Plaintiff's Amended Complaint.

309.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 309 of Plaintiff's Amended Complaint.

310.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 310 of Plaintiff's Amended Complaint.

311.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 311 of Plaintiff's Amended Complaint.

312.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 312 of Plaintiff's Amended Complaint.

313.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 313 of Plaintiff's Amended Complaint.

314.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 314 of Plaintiff's Amended Complaint.

315.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 315 of Plaintiff's Amended Complaint.

316.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 316 of Plaintiff's Amended Complaint.

317.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 317 of Plaintiff's Amended Complaint.

318.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 318 of Plaintiff's Amended Complaint.

319.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 319 of Plaintiff's Amended Complaint.

320.

The King Defendants deny that they expect any payment as alleged in paragraph 320 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 320 of Plaintiff's Amended Complaint.

321.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 321 of Plaintiff's Amended Complaint.

322.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 322 of Plaintiff's Amended Complaint.

323.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 323 of Plaintiff's Amended Complaint.

324.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 324 of Plaintiff's Amended Complaint.

325.

The King Defendants deny that the purported objectives alleged in paragraph 325 of Plaintiff's Amended Complaint were their objectives. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 325 of Plaintiff's Amended Complaint.

326.

The King Defendants deny that they are part of any racketeering enterprise but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 326 of Plaintiff's Amended Complaint.

327.

The King Defendants deny that they are part of any racketeering enterprise but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 327 of Plaintiff's Amended Complaint.

328.

The King Defendants incorporate by reference their responses to paragraphs 1-327 of Plaintiff's Amended Complaint.

329.

The King Defendants deny the allegations contained in paragraph 329 of Plaintiff's Amended Complaint. The King Defendants also deny that they are part of any racketeering enterprise. The King Defendants specifically deny that they are part of the so-called "Conflictineering Enterprise"—and deny participation in any

wrongdoing attributed to this purported enterprise throughout the Amended Complaint.

330.

The King Defendants deny the allegations contained in paragraph 330 of Plaintiff's Amended Complaint. The King Defendants also deny that they are part of any racketeering enterprise. The King Defendants specifically deny that they are part of the so-called "Conflictineering Enterprise"—and deny participation in any wrongdoing attributed to this purported enterprise throughout the Amended Complaint.

331.

The King Defendants deny that they are associated with any racketeering enterprise. The King Defendants also deny that they either aided or abetted any enterprise's racketeering activities. The King Defendants also deny the allegations contained in the last sentence of paragraph 331 of Plaintiff's Amended Complaint.

332.

The King Defendants deny the allegations contained in paragraph 332 of Plaintiff's Amended Complaint.

333.

The King Defendants deny the allegations contained in paragraph 333 of Plaintiff's Amended Complaint.

334.

The King Defendants deny the allegations contained in paragraph 334 of Plaintiff's Amended Complaint.

335.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 335 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 335 of Plaintiff's Amended Complaint.

336.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 336 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 336 of Plaintiff's Amended Complaint.

337.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 337 of Plaintiff's Amended Complaint.

338.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 338 of Plaintiff's Amended Complaint.

339.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 339 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 339 of Plaintiff's Amended Complaint.

340.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 340 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as

to the truth of the allegations contained in paragraph 340 of Plaintiff's Amended Complaint.

341.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 341 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 341 of Plaintiff's Amended Complaint.

342.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 342 of Plaintiff's Amended Complaint.

343.

The King Defendants deny that they engaged in any purported wrongdoing as alleged in paragraph 343 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 343 of Plaintiff's Amended Complaint.

344.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 344 of Plaintiff's Amended Complaint.

345.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 345 of Plaintiff's Amended Complaint.

346.

The King Defendants deny the allegations contained in paragraph 346 of Plaintiff's Amended Complaint.

347.

The King Defendants admit the allegations contained in paragraph 347 of Plaintiff's Amended Complaint.

348.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 348 of Plaintiff's Amended Complaint.

349.

The King Defendants admit the filing of the referenced lawsuit but otherwise deny the allegations contained in paragraph 349 of Plaintiff's Amended Complaint.

350.

The King Defendants deny the allegations contained in paragraph 350 of Plaintiff's Amended Complaint.

351.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 351 of Plaintiff's Amended Complaint.

352.

The King Defendants deny the allegations contained in paragraph 352 of Plaintiff's Amended Complaint.

353.

The King Defendants admit the allegations contained in paragraph 353 of Plaintiff's Amended Complaint.

354.

The King Defendants admit the allegations contained in paragraph 354 of Plaintiff's Amended Complaint.

355.

The King Defendants deny the allegations contained in paragraph 355 of Plaintiff's Amended Complaint.

356.

The King Defendants deny the allegations contained in paragraph 356 of Plaintiff's Amended Complaint.

357.

The King Defendants deny the allegations contained in paragraph 357 of Plaintiff's Amended Complaint.

358.

The King Defendants deny the allegations contained in paragraph 358 of Plaintiff's Amended Complaint.

359.

The King Defendants deny the allegations contained in paragraph 359 of Plaintiff's Amended Complaint.

360.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in the second sentence of paragraph 360 of Plaintiff's Amended Complaint. The King Defendants deny the remaining allegations contained in paragraph 360 of Plaintiff's Amended Complaint.

361.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 361 of Plaintiff's Amended Complaint.

362.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 362 of Plaintiff's Amended Complaint.

363.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 363 of Plaintiff's Amended Complaint.

364.

The King Defendants admit the allegations contained in paragraph 364 of Plaintiff's Amended Complaint.

365.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 365 of Plaintiff's Amended Complaint.

366.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 366 of Plaintiff's Amended Complaint.

367.

The King Defendants admit the allegations contained in the first sentence of paragraph 367 of Plaintiff's Amended Complaint. The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 367 of Plaintiff's Amended Complaint.

368.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 368 of Plaintiff's Amended Complaint.

369.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 369 of Plaintiff's Amended Complaint.

370.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 370 of Plaintiff's Amended Complaint.

371.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 371 of Plaintiff's Amended Complaint.

372.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 372 of Plaintiff's Amended Complaint.

373.

The King Defendants admit the allegations contained in paragraph 373 of Plaintiff's Amended Complaint.

374.

The King Defendants admit that Defendant Farmer made assertions about Dr. Nice's past. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 374 of Plaintiff's Amended Complaint.

375.

The King Defendants deny that they acted with any illegal or illegitimate motive but lack knowledge or information sufficient to form a belief as to the truth of the allegations about Defendant Farmer's motivation for filing the referenced briefs. The King Defendants otherwise admit the allegations contained in paragraph 375 of Plaintiff's Amended Complaint.

376.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 376 of Plaintiff's Amended Complaint.

377.

In response to the allegations contained in paragraph 377 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced letters speak for themselves. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 377 of Plaintiff's Amended Complaint.

378.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in the first sentence of paragraph 378 of Plaintiff's Amended Complaint. The King Defendants admit the remaining allegations contained in paragraph 378 of Plaintiff's Amended Complaint.

379.

The King Defendants admit the allegations contained in paragraph 379 of Plaintiff's Amended Complaint.

380.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 380 of Plaintiff's Amended Complaint.

381.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 381 of Plaintiff's Amended Complaint.

382.

In response to the allegations contained in paragraph 382 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced letters speak for themselves. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 382 of Plaintiff's Amended Complaint.

383.

In response to the allegations contained in paragraph 383 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced letters speak for themselves. The King Defendants otherwise lack knowledge or

information sufficient to form a belief as to the truth of the allegations contained in paragraph 383 of Plaintiff's Amended Complaint.

384.

In response to the allegations contained in paragraph 384 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced letters speak for themselves. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 384 of Plaintiff's Amended Complaint.

385.

In response to the allegations contained in paragraph 385 of Plaintiff's Amended Complaint, the King Defendants simply state that the referenced letters speak for themselves. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 385 of Plaintiff's Amended Complaint

386.

The King Defendants admit that Dr. McGarrah moved to withdraw but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 386 of Plaintiff's Amended Complaint.

387.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 387 of Plaintiff's Amended Complaint.

388.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 388 of Plaintiff's Amended Complaint.

389.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 389 of Plaintiff's Amended Complaint.

390.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 390 of Plaintiff's Amended Complaint.

391.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 391 of Plaintiff's Amended Complaint.

392.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 392 of Plaintiff's Amended Complaint.

393.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 393 of Plaintiff's Amended Complaint.

394.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 394 of Plaintiff's Amended Complaint.

395.

The King Defendants admit the allegations contained in paragraph 395 of Plaintiff's Amended Complaint.

396.

The King Defendants deny the allegations contained in the first sentence of paragraph 396 of Plaintiff's Amended Complaint. In response to the remaining allegations contained in paragraph 396 of Plaintiff's Amended Complaint, the King Defendants respond that the referenced filings speak for themselves.

397.

The King Defendants deny the allegations contained in paragraph 397 of Plaintiff's Amended Complaint.

398.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 398 of Plaintiff's Amended Complaint.

399.

The King Defendants admit the allegations contained in the first sentence of paragraph 399 of Plaintiff's Amended Complaint. The affidavit speaks for itself.

Insofar as the remaining allegations contained in paragraph 399 of Plaintiff's Amended Complaint require any additional response, the King Defendants deny them.

400.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 400 of Plaintiff's Amended Complaint.

401.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 401 of Plaintiff's Amended Complaint.

402.

The King Defendants deny that they received any extortionate payments but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 402 of Plaintiff's Amended Complaint.

403.

The King Defendants deny the allegations contained in paragraph 403 of Plaintiff's Amended Complaint.

404.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 404 of Plaintiff's Amended Complaint.

405.

The allegations of paragraph 405 of Plaintiff's Amended Complaint merely state legal conclusions and therefore require no response.

406.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 406 of Plaintiff's Amended Complaint.

407.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 407 of Plaintiff's Amended Complaint but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 407 of Plaintiff's Amended Complaint.

408.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 408 of Plaintiff's Amended Complaint.

409.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 409 of Plaintiff's Amended Complaint but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 409 of Plaintiff's Amended Complaint.

410.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 410 of Plaintiff's Amended Complaint.

411.

The King Defendants deny that the conduct alleged in lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 411 of Plaintiff's Amended Complaint.

412.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 412 of Plaintiff's Amended Complaint.

413.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 413 of Plaintiff's Amended Complaint.

414.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 414 of Plaintiff's Amended Complaint.

415.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 415 of Plaintiff's Amended Complaint.

416.

The allegations of paragraph 416 merely state legal conclusions to which no response is required.

417.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 417 of Plaintiff's Amended Complaint.

418.

The allegations of paragraph 418 merely state legal conclusions to which no response is required.

419.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 419 of Plaintiff's Amended Complaint.

420.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 420 of Plaintiff's Amended Complaint.

421.

The King Defendants deny that they received any benefits or engaged in any wrongdoing as alleged in paragraph 421 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 421 of Plaintiff's Amended Complaint.

422.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 422 of Plaintiff's Amended Complaint.

423.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 423 of Plaintiff's Amended Complaint.

424.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 424 of Plaintiff's Amended Complaint.

425.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 425 of Plaintiff's Amended Complaint.

426.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 426 of Plaintiff's Amended Complaint.

427.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 427 of Plaintiff's Amended Complaint.

428.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 428 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 428 of Plaintiff's Amended Complaint.

429.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 429 of Plaintiff's Amended Complaint.

430.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 430 of Plaintiff's Amended Complaint.

431.

The King Defendants deny that they engaged in any of the conduct alleged in paragraph 431 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 431 of Plaintiff's Amended Complaint.

432.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 432 of Plaintiff's Amended Complaint.

433.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 433 of Plaintiff's Amended Complaint.

434.

The King Defendants acknowledge sending the June 6, 2012 letter referenced in paragraph 434 of Plaintiff's Amended Complaint and acknowledge that it speaks for itself. The King Defendants otherwise deny the allegations contained in paragraph 434 of Plaintiff's Amended Complaint.

435.

The King Defendants deny the allegations contained in paragraph 435 of Plaintiff's Amended Complaint.

436.

The King Defendants deny the allegations contained in paragraph 436 of Plaintiff's Amended Complaint.

437.

The King Defendants deny the allegations contained in paragraph 437 of Plaintiff's Amended Complaint.

438.

The first sentence of paragraph 438 of Plaintiff's Amended Complaint merely states a legal conclusion and therefore requires no response. Insofar as the first sentence requires any response, the King Defendants deny it. The King Defendants also deny the remaining allegations in paragraph 438 of Plaintiff's Amended Complaint.

439.

The King Defendants deny the allegations contained in paragraph 439 of Plaintiff's Amended Complaint.

440.

The King Defendants deny the allegations contained in paragraph 440 of Plaintiff's Amended Complaint.

441.

The King Defendants deny the allegations contained in paragraph 441 of Plaintiff's Amended Complaint.

442.

The King Defendants deny the allegations contained in paragraph 442 of Plaintiff's Amended Complaint.

443.

The King Defendants deny the allegations contained in paragraph 443 of Plaintiff's Amended Complaint.

444.

The King Defendants deny the allegations contained in paragraph 444 of Plaintiff's Amended Complaint.

445.

The King Defendants deny the allegations contained in paragraph 445 of Plaintiff's Amended Complaint.

446.

The King Defendants deny the allegations contained in paragraph 446 of Plaintiff's Amended Complaint.

447.

The King Defendants deny the allegations contained in paragraph 447 of Plaintiff's Amended Complaint.

448.

The King Defendants deny the allegations contained in paragraph 448 of Plaintiff's Amended Complaint.

449.

The King Defendants deny the allegations contained in paragraph 449 of Plaintiff's Amended Complaint.

450.

The King Defendants deny the allegations contained in paragraph 450 of Plaintiff's Amended Complaint.

451.

The King Defendants deny the allegations contained in paragraph 451 of Plaintiff's Amended Complaint.

452.

The King Defendants deny the allegations contained in paragraph 452 of Plaintiff's Amended Complaint.

453.

The King Defendants deny the allegations contained in paragraph 453 of Plaintiff's Amended Complaint.

454.

The King Defendants repeat and incorporate by reference their responses to paragraphs 1-327 of Plaintiff's Amended Complaint.

455.

The King Defendants deny the allegations contained in paragraph 455 of Plaintiff's Amended Complaint.

456.

The King Defendants deny the allegations contained in paragraph 456 of Plaintiff's Amended Complaint.

457.

The King Defendants deny the allegations contained in paragraph 457 of Plaintiff's Amended Complaint.

458.

The King Defendants deny the allegations contained in paragraph 458 of Plaintiff's Amended Complaint.

459.

The King Defendants deny the allegations contained in paragraph 459 of Plaintiff's Amended Complaint.

460.

The King Defendants deny the allegations contained in paragraph 460 of Plaintiff's Amended Complaint.

461.

The King Defendants deny the allegations contained in paragraph 461 of Plaintiff's Amended Complaint.

462.

The King Defendants deny the allegations contained in paragraph 462 of Plaintiff's Amended Complaint.

463.

The King Defendants deny the allegations contained in paragraph 463 of Plaintiff's Amended Complaint.

464.

The King Defendants deny the allegations contained in paragraph 464 of Plaintiff's Amended Complaint.

465.

The King Defendants repeat and incorporate by reference their responses to paragraphs 1-327 of Plaintiff's Amended Complaint.

466.

The King Defendants deny the allegations contained in paragraph 466 of Plaintiff's Amended Complaint.

467.

The King Defendants deny the allegations contained in paragraph 467 of Plaintiff's Amended Complaint.

468.

The King Defendants deny the allegations contained in paragraph 468 of Plaintiff's Amended Complaint.

469.

The King Defendants deny the allegations contained in paragraph 469 of Plaintiff's Amended Complaint.

470.

The King Defendants deny the allegations contained in paragraph 470 of Plaintiff's Amended Complaint.

471.

Aside from responding that the allegations of Plaintiff's Amended Complaint speak for themselves, the King Defendants lack knowledge or information sufficient to form a belief as to what allegations Plaintiff intends to rely on. The King Defendants deny that they committed any of the alleged crimes referenced in paragraph 471 of Plaintiff's Amended Complaint.

472.

The King Defendants deny the allegations contained in paragraph 472 of Plaintiff's Amended Complaint.

473.

The King Defendants deny the allegations contained in paragraph 473 of Plaintiff's Amended Complaint.

474.

The King Defendants deny the allegations contained in paragraph 474 of Plaintiff's Amended Complaint.

475.

The King Defendants deny the allegations contained in paragraph 475 of Plaintiff's Amended Complaint.

476.

The King Defendants deny the allegations contained in paragraph 476 of Plaintiff's Amended Complaint.

477.

The King Defendants deny the allegations contained in paragraph 477 of Plaintiff's Amended Complaint.

478.

The King Defendants deny the allegations contained in paragraph 478 of Plaintiff's Amended Complaint.

479.

The King Defendants deny the allegations contained in paragraph 479 of Plaintiff's Amended Complaint.

480.

The King Defendants deny the allegations contained in paragraph 480 of Plaintiff's Amended Complaint.

481.

The King Defendants deny the allegations contained in paragraph 481 of Plaintiff's Amended Complaint.

482.

The King Defendants deny the allegations contained in paragraph 482 of Plaintiff's Amended Complaint.

483.

The King Defendants deny the allegations contained in paragraph 483 of Plaintiff's Amended Complaint.

484.

The King Defendants deny the allegations contained in paragraph 484 of Plaintiff's Amended Complaint.

485.

The King Defendants deny the allegations contained in paragraph 485 of Plaintiff's Amended Complaint.

486.

The King Defendants deny the allegations contained in paragraph 486 of Plaintiff's Amended Complaint.

487.

The King Defendants repeat and incorporate by reference their responses to paragraph 1-327 of Plaintiff's Amended Complaint.

488.

The King Defendants deny the allegations contained in paragraph 488 of Plaintiff's Amended Complaint.

489.

The King Defendants deny the allegations contained in paragraph 489 of Plaintiff's Amended Complaint.

490.

The King Defendants deny the allegations contained in paragraph 490 of Plaintiff's Amended Complaint.

491.

The King Defendants deny the allegations contained in paragraph 491 of Plaintiff's Amended Complaint.

492.

The King Defendants deny the allegations contained in paragraph 492 of Plaintiff's Amended Complaint.

493.

The King Defendants deny the allegations contained in paragraph 493 of Plaintiff's Amended Complaint.

494.

The King Defendants deny the allegations contained in paragraph 494 of Plaintiff's Amended Complaint.

495.

The King Defendants repeat and incorporate by reference their responses to paragraphs 1-327 of Plaintiff's Amended Complaint.

496.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 496 of Plaintiff's Amended Complaint.

497.

The King Defendants deny that they engaged in any wrongdoing but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 497 of Plaintiff's Amended Complaint.

498.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 498 of Plaintiff's Amended Complaint.

499.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 499 of Plaintiff's Amended Complaint.

500.

The King Defendants deny that they engaged in any wrongdoing but otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 500 of Plaintiff's Amended Complaint.

501.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 501 of Plaintiff's Amended Complaint.

502.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 502 of Plaintiff's Amended Complaint.

503.

The King Defendants deny that they generated adverse publicity or made use of social media as alleged in paragraph 503 of Plaintiff's Amended Complaint. The King Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 503 of Plaintiff's Amended Complaint.

504.

The King Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 504 of Plaintiff's Amended Complaint.

The King Defendants deny the prayer for relief following paragraph 504 of Plaintiff's Amended Complaint. Any allegations not specifically admitted hereby stand denied.

This 14th day of April, 2016.

/s John C. Rogers
JOHANNES S. KINGMA
Georgia State Bar No. 421650
jkingma@carlockcopeland.com
JOHN C. ROGERS
Georgia State Bar No. 612741
jrogers@carlockcopeland.com

CARLOCK, COPELAND & STAIR, LLP
191 Peachtree Street, 36th Floor
Atlanta, Georgia 30303
(404) 522-8220

CERTIFICATE OF SERVICE

I hereby certify that I have served the Answer of Alfred L. King, Jr. and Larry King, P.C. to Plaintiff's Amended Complaint on all parties by filing it with the Court's electronic filing system, which should deliver copies to:

Wilmer Parker
Maloy Jenkins Parker
75 Fourteenth Street, 25th Floor
Atlanta, GA 30309

Millard C. Farmer, Jr.
P.O. Box 1728
Atlanta, GA 30301

Mary Helen Moses
P.O. Box 20673
St. Simon's Island, GA 31522

This 14th day of April, 2016.

By: /s John C. Rogers
JOHN C. ROGERS
Georgia State Bar No. 612741

*Counsel for Defendants Larry King,
P.C. and Alfred L. King, Jr.*

Carlock, Copeland & Stair, LLP
191 Peachtree Street, 36 Floor
Atlanta, GA 30303
(404) 522-8220